



April 5, 2012

Kathleen Baskin, P.E.  
Director of Water Policy and Planning  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114  
Via Email

***Re: Massachusetts Sustainable Water Management Initiative Framework Summary***

Dear Ms. Baskin,

The Massachusetts Association of Lawn Care Professionals is an association of licensed applicators, turf educators, suppliers, municipalities, schools and other professionals. We are celebrating our 23<sup>rd</sup> year in operation.

We are writing to express our concern over the SWMI proposal that calls for excessive limitations on watering of turf and landscapes. We have been part of water discussions since our inception on both the state and national levels. We are members of the SUASCO Watershed Community Council. We educate our members on scientific data regarding water and plants. Speakers come to our numerous educational seminars to inform our members on water topics.

It is unclear to us how the determinations to impose such stringent limitations are being made. When interacting with professionals from numerous industries and walks of life from other states, Massachusetts is viewed as having foresight in how it has handled its water issues over the years. The MWRA, the calculations on 300 year water reserves, our reservoir systems, etc. are praised. Now, when those same people hear all of the discussion about Massachusetts not having enough water, it is often pointed out that we are blessed with 43" of rainfall, forests, numerous lakes ponds and an abutting ocean. Many of these people live in areas that receive 3" to 4.5" of rain per year and they have figured out how to maintain grassy parks, lawns and ornamental trees using innovative techniques. They ask us why officials are behaving as if we did not have such a valuable resource.

We have all seen water running over the reservoir dams. They have sufficient supplies because of the foresight of our predecessors. We read the reports done 100 years apart in Boston showing the similar water usage amounts, despite a massive increase in population and growth. We all know the value of proper pipe and facilities maintenance in conserving water.

Water audits are used around the country and in some towns in MA. We were very surprised by the response of a high level state environmental official to a question from the audience, at a presentation by this person about Water in Massachusetts. The question concerned the

information obtained by the DEP from water audits. Although she held a higher level position, the presenter asked the questioner what were water audits. Those towns that do use water audits are able to work with their population to educate them on effective and efficient management of this valuable resource.

Many people overwater their lawns. This is due to lack of serious education. Water departments note that those communities that restrict water usage to certain days place people in the dubious position of watering when their lawn is not in need. Water is unnecessarily spent. The positive side of this is that the water stays in the local area thanks to grass being an permeable surface..

New technology is available which directs irrigation systems to automatically turn on AND turn off based upon the environmental needs. Water is properly used. There are new grass seeds that use less water.

Thirsty grass plants cannot provide the numerous benefits to humans and the environment that healthy grass usually does. Carbon sequestration, erosion control (used in Stormwater controls around the world), oxygen emission, positive psychological contributions and the capture of particulates are included among the list that has been documented through research.

Please include us on the list of those receiving notices from you. We did not know about the public discussion being held on this important topic. Our email is [malcp@yahoo.com](mailto:malcp@yahoo.com).

Thank you.  
Sincerely,

Karen T. Connelly  
Executive Director, MALCP

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